

December 21, 2017

<u>Via ECF</u>
The Honorable Alison J. Nathan United States District Judge Southern District of New York 40 Foley Square New York, N.Y. 10007

Re: <u>United States v. Nico Burrell</u>
15 Cr. 95 (AJN)
Request for Adjournment of Sentencing Hearing

Dear Judge Nathan:

I write to respectfully request that Mr. Burrell's Sentencing Hearing, currently scheduled for January 4, 2018, be adjourned to a date in the last week of March, 2018. This is our first such request. The reasons for this request are: (1) the final pre-sentence report has not yet been disclosed; and (2) so that Counsel may continue to prepare Mr. Burrell's sentencing submission, which includes the review and preparation of documentation including letters and reports that have not yet been received. Accordingly, I am requesting an adjournment for the week of March 26, 2018, (except Monday, March 26<sup>th</sup>) or any date thereafter that is convenient for the Court. I have conferred with AUSA Rachel Maimin and she has no objection to this request.

I thank the Court in advance for its consideration of this request.

Respectfully,

Judith Vargas

Attorney for Mr. Nico Burrell

s/Ludith Varaas